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and Counterclaim-Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

**GREAT WEST CAPITAL, LLC**, a Delaware  
limited liability company,

Case No. 3:22-cv-00768-IM

Plaintiff, **COUNTERCLAIM-DEFENDANTS'**  
**UNOPPOSED MOTION FOR**  
**EXTENSION OF TIME TO**  
**RESPOND TO**  
**DEFENDANTS/COUNTERCLAIM-PLAINTIFFS' COUNTERCLAIMS**

v.  
**JACK PAYNE; JUNIPER MOUNTAIN**  
**CATTLE, LLC (RACHEL PAYNE,**  
**Manager)**, a Nevada limited liability company;  
and **NEVADA LIVESTOCK MARKETING,**  
**LLC (RACHEL PAYNE, Manager)**, a  
Nevada limited liability company,

Defendants/Counterclaim-  
Plaintiffs,

v.

**EASTGATE CATTLE COMPANY, LLC**, a  
limited liability company; and **ARTHUR H.**  
**BERG**, an individual,

Counterclaim-Defendants.

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**LOCAL RULE 7-1 CERTIFICATION**

The undersigned counsel certifies that the parties conferred regarding the subject of this motion and that on August 5, 2022, defendants/counterclaim-plaintiffs Jack Payne, Juniper

Mountain Cattle, LLC, and Nevada Livestock Marketing LLC's counsel consented to the extension of time for counterclaim-defendants Eastgate Cattle Company, LLC and Arthur H. Berg to answer, plead, or otherwise respond to defendants/counterclaim-plaintiffs' counterclaims.

**MOTION**

Counterclaim-defendants Eastgate Cattle Company, LLC, and Arthur Berg move for an extension of time from August 19, 2022, until September 30, 2022, to respond to defendants/counterclaim-plaintiffs' counterclaims. (Declaration of April Stone in Supp. of Mot. for Ext. Time to Respond to Counterclaims ("Stone Decl.") ¶¶ 2-3.) This is counterclaim-defendants' first request for an extension of time to answer defendants/counterclaim-plaintiffs' counterclaims. (*Id.* ¶ 4.) This declaration is not filed for the purpose of delay, and no party will be prejudiced by the granting of this motion. (*Id.* ¶ 5.)

DATED this 15th day of August 2022.

MARKOWITZ HERBOLD PC

By: s/April M. Stone

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